



October 20, 2004

Jim Christiansen
EPA Region VIII
999 18th St., Suite 300
Denver, CO 80202

RE: Libby Railyard Biotite Removal, Libby, Montana
EMR Project No. 5539.004
October 15, 2004 Weekly Progress Report

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EPA REGION VIII
SUPERFUND BRANCH

Dear Mr. Christiansen,

Per the Administrative Order on Consent for Removal, the following is the Weekly Progress Report submitted by EMR, Inc. (EMR) on behalf of the Burlington Northern and Santa Fe Railway Company (BNSF) for the Libby Railyard, Montana, Libby Asbestos Site, Libby Montana. In addition to this report, EMR will also be responsible for the required monthly report on this project through the close of this project.

CURRENT WEEK'S ACTIVITIES

Envirocon, Inc. (Envirocon) completed the removal of railroad ties; all removed ties were washed and were loaded into high-sided gondola railroad cars and staged off site pending final disposal arrangements.

Envirocon continued with soil excavation on the west end of the site and shipped 3,607 tons in 296 truckloads to the Lincoln County Landfill between Monday, October 11, 2004 and Friday, October 15, 2004. During this week Envirocon was also hauling clean fill and sub-ballast into the site for backfilling and capping and placing geotextile cloth.

Following receipt of potentially conflicting clearance sample results for composite sample BR-18000 and the discreet samples BR-18001 through BR18004, it was decided that the entire section represented by sample BR-18000 should be excavated to a deeper depth and re-sampled. This section is approximately 200 feet in length and 10 feet wide along the former track 2. Following the completion of this excavation, the area will be sampled to confirm that no LA is present at the new base of excavation.

Air samples are being collected daily. Personal samples are being analyzed by a combination of Phase Contrast Microscopy (Method 7400, Issue 2) and Transmission Electron Microscopy (TEM) AHERA method. Area samples are being analyzed by TEM AHERA Method. Preliminary laboratory results for TEM samples are being submitted to the USEPA and Volpe via facsimile upon receipt by EMR in Minneapolis, Minnesota. Final laboratory data will be submitted in hard copy form in the final report.

Results of air samples received during the week indicated two samples with detectable Libby Amphibole (LA). The laboratory detected two asbestos structures in air sample

BN-00301 and one asbestos structure in sample BN-00399 resulting in airborne asbestos concentrations of 0.0086 and 0.0040 structures per cubic centimeter (S/cc), respectively. The detectable concentrations of asbestos or LA fibers did not exceed the clean air standard of 0.01 fibers per cubic centimeter, thus the workers did not exceed the protection of their respirators.

Clearance soil samples are being collected at the east end of the site; as of the October 15, results for samples BR-31000 through BR-46000 had been received. LA was detected in clearance samples BN-32000 and BR-41000 at a concentration <1% tremolite/actinolite. No LA was detected in the other clearance sample results received during this week.

During the previous week, LA was detected at a concentration of less than one percent (<1%) tremolite/actinolite in clearance samples BR-29000 and BR-30000; EMR requested that the discreet samples for these two composites be analyzed. Sample BR-29000 was a composite made up of four discreet samples (BR-29001 through BR-29004); LA was detected in sample BR-29001 at a concentration of <1% tremolite/actinolite. Samples BR-29002 through BR29004 did not contain asbestos above detection limits. Sample BR-30000 was a composite sample made up of five discreet samples (BR-30001 through BR30005); LA was detected at a concentration of <1% tremolite/actinolite in all five discreet samples.

All soil samples are submitted for analysis by Polarized Light Microscopy (PLM) method 9002, Issue 2. Additional discreet samples were submitted but were not analyzed at this time. Preliminary data has been received by EMR and was submitted via facsimile to the USEPA. No final copies of soil analytical data collected last week have been received.

PROBLEMS ENCOUNTERED

No problems have been encountered to date.

ACTIVITIES PLANNED FOR NEXT TWO WEEKS

Soil removal will continue at the west end; it is estimated that no more than two or three days of loading will be required. Cutting and grubbing of brush, trees, and weeds will occur along the property boundary on the west end of the Site prior to capping that area.

Backfilling and grading will continue in areas that have passed soil clearance without detections of LA. Clean fill and the geotextile cloth cap placement will continue. Filter fabric will be placed over the capped areas along tracks 3 and 4 on the east end of the Site.

If you have any questions or require further explanation concerning the above information, please call Tanya Drake of EMR at (763) 277-5200, Chuck Soule of Kennedy/Jenks Consultants at (253) 874-0555, or David Smith of BNSF at (406) 447-2307.

Sincerely,
EMR, Inc.

A handwritten signature in black ink, appearing to read 'Tanya Drake', with a long horizontal flourish extending to the right.

Tanya Drake
Project Coordinator

cc: Mr. David Smith, BNSF Manager Environmental Remediation, Helena, Montana
Mr. Dave Diem, Kennedy/Jenks Consultants, Libby, Montana
Mr. Chuck Soule, Kennedy/Jenks Consultants, Federal Way, Washington
Ms. Courtney Zamora, Volpe Federal Programs, Libby, Montana
Mr. Dan McCaskill, BNSF Industrial Hygiene, Ft. Worth, Texas